

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LOUIS VUITTON MALLETIER	§	
Plaintiff,	§	CIVL ACTION
v.	§	SA-11-CV-00124-HLH
EISENHAUER ROAD FLEA MARKET, INC., BRUCE L. GORE, AND PATRICIA D. WALKER,	§	
Defendants.	§	

**DECLARATION OF TED D. LEE IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

I, Ted D. Lee, declare the following:

1. I am over eighteen (18) years of age and competent to make this affidavit.
2. I have personal knowledge of the facts stated in this affidavit. To my knowledge, all of the facts stated in this affidavit are true and correct.
3. I am an attorney of record for all Defendants in this case.
4. Exhibit A to Defendants' Motion for Summary Judgment is a true and correct copy of Bruce L. Gore's deposition excerpts. Mr. Gore was deposed October 20, 2011.
5. Exhibit B to Defendants' Motion for Summary Judgment is a true and correct copy of Patricia D. Walker's deposition excerpts. Ms. Walker was deposed October 21, 2011.
6. Exhibit C to Defendants' Motion for Summary Judgment is a true and correct copy of Kenneth C. Klug's deposition excerpts. Mr. Klug was deposed October 26, 2011.
7. Exhibit D to Defendants' Motion for Summary Judgment is a true and correct copy of Stephanie Voyles's deposition excerpts. Ms. Voyles was deposed October 25, 2011.

8. Exhibit E to Defendants' Motion for Summary Judgment is a true and correct copy of Joel Voyles's deposition excerpts. Mr. Voyles was deposed October 25, 2011.
9. Exhibit F to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 34.
10. Exhibit G to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 1 (LV00032 – 35).
11. Exhibit H to Defendants' Motion for Summary Judgment is a true and correct copy of Defendants' Deposition Exhibit 26, Plaintiff's Responses to Defendants' First Set of Interrogatories.
12. Exhibit I to Defendants' Motion for Summary Judgment is a true and correct copy of Defendants' Deposition Exhibit 25 (LV 000656 – 664).
13. Exhibit J to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 6 (LV 00046 – 48).
14. Exhibit K to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 27 (LV 000179 – 206).
15. Exhibit L to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 11 (LV 000157 – 158).
16. Exhibit M to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 14 (LV 000163 – 166).
17. Exhibit N to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 18 (LV 000173 – 174).
18. Exhibit O to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 19 (E000054–59; 82–97; 6828–6834; 6843–44).
19. Exhibit P to Defendants' Motion for Summary Judgment is a true and correct copy of Defendants' Termination of Lease Letters, (E009513–20).
20. Exhibit Q to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 24 (LV 00171–174).
21. Exhibit R to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibit 25 (LV 00175–176).

22. Exhibit S to Defendants' Motion for Summary Judgment is a true and correct copy of Plaintiff's Deposition Exhibits 38 and 39 (E000098 - 99).
23. Exhibit T to Defendants' Motion for Summary Judgment is a true and correct copy of Defendants' Deposition Exhibit 4.
24. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on November 10, 2011.

By: 

Ted D. Lee